

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

MICHAEL P. AND SHELLIE GILMOR,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 4:10-CV-00189-ODS
)	
PREFERRED CREDIT CORPORATION,)	
et al.,)	
)	
Defendants.)	

**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME OF DEFENDANT
JP MORGAN CHASE BANK NATIONAL ASSOCIATION, AS FORMER TRUSTEE,
TO SERVE OBJECTIONS AND RESPONSES TO WRITTEN DISCOVERY**

Defendant JP Morgan Chase Bank National Association, as former trustee (“JPMC”), pursuant to Fed. R. Civ. P. 6(b), hereby moves for additional time in which to serve its responses to plaintiffs’ first set of interrogatories, document requests and requests to admit. In support of its motion, defendant states as follows:

SUGGESTIONS IN SUPPORT

1. In or about March 2004, JPMC was joined as a party in this case.
2. Plaintiffs first served written discovery upon JPMC as former trustee on May 10, 2012.
3. JPMC’s responses to the plaintiffs’ first set of discovery requests are currently due on June 13, 2012.
4. JPMC needs an enlargement of time to serve its written responses. Plaintiffs’ discovery is broad in scope, both in terms of its subject matter and time (by its instruction covering ten to fifteen years). Additional investigation is necessary requiring more time to complete the

responses. Moreover, due to various absences of personnel during the months of May and June, JPMC needs additional time to complete its responses.

5. JPMC requests that the Court grant it a fourteen-day enlargement and permit it to serve written responses (answers, responses and/or objections) by June 27, 2012.

6. JPMC's counsel has discussed this motion for an enlargement of time with counsel for plaintiffs who have stated they have no objection.

7. This motion for an enlargement of time is made in good faith and not for the purpose of delay.

8. No prior requests for additional time have been made. JPMC believes this motion for an enlargement of time will not unfairly prejudice plaintiffs or any other party to this action.

WHEREFORE, defendant JP Morgan Chase Bank National Association, as former trustee, respectfully requests this Court to enlarge the time within which it may serve its discovery responses to and including June 27, 2012.

Respectfully submitted,

/s/ Mark A. Olthoff

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document was filed electronically with the above-captioned court, with notice of case activity to be generated and sent electronically by the Clerk of said court (with a copy to be mailed to any individuals who do not receive electronic notice from the Clerk) this 13th day of June, 2012, to all counsel of record.

/s/ Mark A. Olthoff

Attorney for JP Morgan Chase Bank
National Association, as former trustee